

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bay State Gas Company

D.T.E. 05-27

ATTORNEY GENERAL'S TWENTY-THIRD SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-23-1 Please refer to the June 17, 2005, letter from the Company to the Attorney General regarding overdue discovery responses, p. 2, § 4. List what categories of data are maintained in the Microsoft Access system used by the Brockton operations center for leak reports. For the years 1990 to 2005, produce all reports related to leaks on unprotected bare steel from the Access system. For the years 1990 to 2005, produce all reports related to leaks on unprotected coated steel from the Access system.
- AG-23-2 Please refer to the June 17, 2005, letter from the Company to the Attorney General regarding overdue discovery responses, p. 2. Why did the Company include all types of steel pipe (bare, coated and protected coated) under the data entry category for bare steel in the WOMS database? When was the decision made to include all types of steel pipe (bare, coated and protected coated) under the category for bare steel? Did the Company ever maintain those different types of pipe materials as separate data fields?
- AG-23-3 Please refer to the June 17, 2005, letter from the Company to the Attorney General regarding overdue discovery responses, p. 3. List what categories of data are maintained in the Compliance Management System ("CMS"). List what types of reports are available from the CMS. For the years 1990 to 2005, produce all reports related to leaks on unprotected bare steel services. For the years 1990 to 2005, produce all reports related to leaks on unprotected coated steel services. For the years 1990 to 2005 produce all reports that indicate the Company is not in compliance with code.
- AG-23-4 Refer to the Company's response to AG-2-1(Attachments 1 to 4) (June 6, 2005). Produce all work papers, calculations and assumptions for the calculations in

these spread sheets. If the Company submits revised calculations for these spread sheets, explain the reason for the revision, indicate the Bay State employee(s) responsible for any manual review of any Company files that gathered data for the revision, identify exactly which work dossiers or other Company files were reviewed and produce all work papers, calculations and assumptions for the the revised calculations in these spread sheets.

- AG-23-5 Please identify the manufacture by name, address and phone number of the unprotected coated steel mains that Company has replaced since 1990 in Brockton and Lawrence. Has the Company ever contacted the manufacturer of these unprotected coated steel pipes (or the company responsible for the coatings) regarding leaks, regardless of whether the Company submitted a formal warranty claim? Describe the results of any discussions and produce all documents related to contact with the manufacturer(s).
- AG-23-6 Please identify by name, address, telephone number the contractor that was responsible for installing the unprotected coated steel mains that Company has replaced since 1990 in Brockton and Lawrence, and identify by name, address, telephone number the contractor that was responsible for the replacing these mains. Produce copies of the contract for the installation services.
- AG-23-7 Please refer to the June 17, 2005, letter from the Company to the Attorney General regarding overdue discovery responses, Attachment B. Produce copies of this report for each month in 2004.
- AG-23-8 Please refer to the June 17, 2005, letter from the Company to the Attorney General regarding overdue discovery responses, Attachment D, page 8. Provide the definitions for all the column headings.
- AG-23-9 Please refer to the June 17, 2005, letter from the Company to the Attorney General regarding overdue discovery responses, Attachment E. Explain why there are blanks under the column "Exposed Pipe Type" throughout the report.
- AG-23-10 Produce a copy of the Company's Corrosion Monitoring Program manual, and any reports related to the monitoring program.
- AG-23-11 Produce a copy of the Company's Corrosion Monitoring Program manual, and any reports related to the monitoring program.
- AG-23-12 Produce a copy of the Company's Pipe Excavation and Installation Procedures manual. Include in this response all written specifications regarding excavation, pipe repair, new pipe replacement and backfilling of the pipe.

Dated: June 20, 2005